



purposes of the Partial Settlements only;

- (e) scheduling the Final Approval Hearing for the Partial Settlements; and
- (f) granting such other and further relief as the Court deems just and proper

(the “Motion”).

The proposed Partial Settlements were reached by Lead Plaintiff and defendants PricewaterhouseCoopers Auditing Company S.A. (“PwC Greece”) and Deloitte Certified Public Accountants, S.A. (“Deloitte Greece”). In light of the recent settlement with Deloitte Greece and the desire to combine notice and proceed with the distribution of the Net Settlement Funds upon final approval, this motion is submitted in place of the motion to preliminarily approve the proposed Partial Settlement with PwC Greece submitted on November 9, 2021 (ECF Nos. 327-30) and incorporates the Partial Settlements with both PwC Greece and Deloitte Greece.

The proposed Partial Settlements would resolve the claims against PwC Greece and Deloitte Greece (the “Settling Defendants”) and release claims against the Settling Defendants, four defendants who were initially named in the action but had been dismissed by order dated March 29, 2021 (ECF No. 293) (namely PricewaterhouseCoopers International Limited (“PwCIL”), PricewaterhouseCoopers LLP (“PwC US”), Deloitte & Touche LLP (“Deloitte US”) and Deloitte Touche Tohmatsu Limited (“DTTL”)) and other Released Parties defined in the settlement agreements.

These proposed Partial Settlements do not release claims against defendants Dimitris Melisanidis and Spyros Gianniotis (the “Non-Settling Defendants”), or any Dismissed Defendants other than PwCIL, PwC US, Deloitte US and DTTL.

PwC Greece and Deloitte Greece each support the relief requested and will not oppose this motion.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Lead Plaintiff submits herewith: (1) Memorandum in Support of Lead Plaintiff’s Motion; and (2) the Declaration of Nicole Lavalée in support thereof with exhibits thereto.

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Dated: March 24, 2022

Respectfully submitted,

**BERMAN TABACCO**

By: /s/ Nicole Lavallee  
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